

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT DELAWARE**

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	:		
ZAXCOM, INC.,	:		
	:		
Plaintiff,	:		
	:		
v.	:		C.A. No. 23-1245-JFM
	:		
	:		<b>JURY TRIAL REQUESTED</b>
RODE MICROPHONES, LLC. and	:		
FREEDMAN ELECTRONICS PTY LTD.,	:		
	:		
Defendants.	:		
	:		
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**MOTION FOR AN ORDER ACKNOWLEDGING SERVICE PURSUANT TO RULE 4(f)(2)(A), OR, IN THE ALTERNATIVE, AN ORDER AUTHORIZING SERVICE ON DEFENDANT FREEDMAN ELECTRONICS PTY LTD PURSUANT TO RULE 4(f)(3)**

If the Court does not grant Plaintiff an order for Default in accordance with its co-pending Motion for Default, the Plaintiff moves this Honorable Court for an Order acknowledging service via registered mail to Freedman at its Australian registered office pursuant to Rule 4(f)(2)(A), or in the alternative, an Order authorizing alternate service on Freedman via registered mail to its Australian address or via email to its U.S.-based legal counsel pursuant to Rule 4(f)(3), and an award of reasonable attorneys' fees and costs incurred in perfecting service on Rode and Freedman, for the reasons set forth in the accompanying Brief and Declaration of Sean O'Kelly, with supporting Exhibits A1 through A4, and the Declaration of Rita C. Chipperson, with supporting Exhibits B1 through B7. If the Court is not inclined to grant the above relief, Plaintiff further moves for an order for limited discovery for information related to the relationship between Freedman and Rode. A proposed Order for the requested relief is respectfully submitted for the Court's consideration.

Dated: March 8, 2024

By: /s/ Sean T. O'Kelly  
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*Attorneys for Plaintiff Zaxcom, Inc.*

**STATEMENT OF COMPLIANCE WITH LOCAL RULE 7.1.1**

Pursuant to Local Rule 7.1.1, undersigned counsel for the moving party held a Rule 7.1.1 Conference with the opposing party on the matters set forth in the motion, and no agreement could be reached.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the electronic filing date of this document, a copy of the foregoing was served automatically via email by the Court's Case Management/Electronic Case Files (CM/ECF) upon all counsel of record including at least:

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